

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

SHANNON PEREZ, et al.,

*Plaintiffs,*

- and -

EDDIE BERNICE JOHNSON, et al.,

- and -

TEXAS STATE CONFERENCE OF  
NAACP BRANCHES, et al.,

*Plaintiff Intervenors,*

v.

RICK PERRY, et al.,

*Defendants,*

CIVIL ACTION NO.  
SA-11-CA-360-OLG-JES-XR  
[Lead case]

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MEXICAN AMERICAN LEGISLATIVE  
CAUCUS, TEXAS HOUSE OF  
REPRESENTATIVES (MALC),

*Plaintiffs,*

- and -

HONORABLE HENRY CUELLAR, et al.,

*Plaintiff Intervenors,*

v.

STATE OF TEXAS, et al.,

*Defendants*

CIVIL ACTION NO.  
SA-11-CA-361-OLG-JES-XR  
[Consolidated case]

TEXAS LATINO REDISTRICTING TASK  
FORCE, et al.,

*Plaintiffs,*

v.

RICK PERRY, et al.,

*Defendants,*

CIVIL ACTION NO.  
SA-11-CA-490-OLG-JES-XR  
[Consolidated case]

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MARAGARITA v. QUESADA, et al.,

*Plaintiffs,*

v.

RICK PERRY, et al.,

*Defendants,*

CIVIL ACTION NO.  
SA-11-CA-592-OLG-JES-XR  
[Consolidated case]

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JOHN T. MORRIS,

*Plaintiff,*

v.

STATE OF TEXAS, et al.,

*Defendants,*

CIVIL ACTION NO.  
SA-11-CA-615-OLG-JES-XR  
[Consolidated case]

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EDDIE RODRIGUEZ, et al.,

*Plaintiff,*

v.

CIVIL ACTION NO.  
SA-11-CA-635-OLG-JES-XR  
[Consolidated case]

STATE OF TEXAS, et al.,

*Defendants.*

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**NOTICE OF DEPOSITION UPON ORAL EXAMINATION OF  
RULE 30(B)(6) WITNESS(ES) DESIGNATED BY THE STATE OF TEXAS**

TO: Defendant, State of Texas; by and through its attorney of record, Greg Abbott, Attorney General of Texas, P.O. Box 12548, Capitol Station Austin, TX 78711-2548.

Pursuant to Federal Rule of Civil Procedure 30, Plaintiffs Texas Latino Redistricting Task Force, et al. ("Task Force"), will take the deposition, by oral examination recorded stenographically before a certified court reporter and videotaped, of Defendant State of Texas pursuant to Rule 30(b)(6) on May 28, 2014, at 1:00 PM at the offices of the Attorney General of Texas, Price Daniel Building 209 West 14th Street, Austin, TX 78701.

Pursuant to Rule 30(b)(6), the State of Texas is directed to designate one or more officers, directors, or managing agents to testify on its behalf on the following matters, dating from October 1, 2010 to the present:

1. The State of Texas's purpose or intent underlying the boundaries of the Texas 2011 enacted congressional redistricting plan C185.
2. The State of Texas's purpose or intent underlying the boundaries of the Texas 2011 enacted state house redistricting plan H283.
3. The State of Texas's purpose or intent underlying the boundaries of the Texas 2013 enacted state house redistricting plan H358.

The person(s) so designated shall testify as to matters known or reasonably available to the State of Texas. You may set forth, for each person designated, the matters on which each

person(s) will testify. Plaintiffs request that the State of Texas provide the names and titles of the person(s) it will designate to give testimony and summaries of the areas in which each designated person will testify at least five business days before the date of the deposition noted above.

Said deposition, answers, and documentation obtained during the same may be read and used as evidence in trial of said cause in accordance with the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

DATED: May 18, 2014

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

/s/ Nina Perales

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FORCE, ET AL.

**Certificate of Service**

The undersigned counsel hereby certifies that she caused a true and correct copy of the above and foregoing to be sent by electronic mail and/or facsimile to the persons listed below by the close of the business day on May 18, 2014.

/s/ Nina Perales

Nina Perales

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